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March 11, 2015

VIA ELECTRONIC FILING

ATTN: Robert D. Mariani, U.S.D.J.

United State District Court
Middle District of Pennsylvania
William J. Nealon Federal Bldg. & U.S. Courthouse
235 N. Washington Avenue
Scranton, PA 18503

RE: Thomas Roman, et al. v. Commonwealth Financial Systems, INC.
CASE NO.: 3:15-cv-00211-RDM

Judge Mariani:

Kindly accept this informal response, in lieu of a more formal submission, to Your Honor's Court order dated March 9, 2015. Due to clerical error, Plaintiff obviously failed to adhere to the Court order requesting status on service of process. We do however believe this submission will clear everything up, as Defendant has been served and while active settlement negotiations are under way, this office will contemporaneously file the affidavit of service in this matter along with a request for default.

In late February of 2015, David P. Force, Esq., an attorney working under my supervision in this matter was contacted by Defendant. The contact was in contemplation of settling this matter. Negotiations are ongoing and the parties are close to resolving the issue. However, Defendant has neither filed an answer nor appeared in the case, and as such, while we will continue active settlement negotiations, a request the Court enter default will be submitted.

Accordingly, we request this Court does not proceed with dismissal, but rather accepts Plaintiff's late submission of the affidavit of service and accompanying request for default.

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Respectfully Submitted,

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